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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HAITIAN BRIDGE ALLIANCE, AFRICAN  
COMMUNITIES TOGETHER, and UNDOCUBLACK  
NETWORK,

Plaintiffs,

-v-

U.S. DEPARTMENT OF HOMELAND SECURITY, U.S.  
CUSTOMS AND BORDER PROTECTION, U.S.  
IMMIGRATION AND CUSTOMS ENFORCEMENT, and  
FEDERAL BUREAU OF PRISONS,

Defendants.

22 Civ. 8344 (ER)

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants U.S. Department of Homeland Security, U.S. Customs and Border Protection, and U.S. Immigration and Customs Enforcement's (collectively, the "DHS Defendants") Motion for Partial Summary Judgment; the Declaration of Fernando Pineiro dated August 11, 2023, and the exhibits annexed thereto; the Declaration of Patrick Howard dated August 11, 2023, and the exhibits annexed thereto; and the Declaration of Catrina Pavlik-Keenan dated August 11, 2023,

and the exhibits annexed thereto, the DHS Defendants, by their attorney, Damian Williams, United States Attorney for the Southern District of New York, hereby moves this Court for an order pursuant to Federal Rule of Civil Procedure 56(a) directing partial summary judgment in their favor.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's endorsed order dated July 28, 2023 [Dkt. No. 58], opposition papers, if any, are due on or before September 15, 2023, and reply papers, if any, are due on or before October 13, 2023.

Dated: August 11, 2023  
New York, New York

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney for the  
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